

## UNITED STATES DISTRICT COURT

for the

WESTERN District of TEXAS**FILED**

October 11, 2024

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

United States of America

v.

Brad Chandler Simpson

BY: CM  
DEPUTY

Case No. SA:24-MJ-1432

Defendant(s)**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of October 10, 2024 in the county of Bexar in the  
Western District of Texas, the defendant(s) violated:*Code Section**Offense Description*

26 USC § 5861(d)

Unlawful Possession of a Firearm Not Registered to Him in the National  
Firearms Registration and Transfer RecordPenalties: 0-10 Years Imprisonment; \$ 250,000 fine; Maximum 3 Years  
Supervised Release; and \$100 Mandatory Special Assessment.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.MATTHEW GULEZIAN Digitally signed by MATTHEW GULEZIAN  
Date: 2024.10.11 08:48:02 -05'00'*Complainant's signature*

SA Matthew Gulezian, ATF

*Printed name and title*

- ☐
- Sworn to before me and signed in my presence.
- 
- ☒
- Sworn to telephonically and signed electronically.

Date: October 11, 2024*Judge's signature*City and state: San Antonio, Texas

Richard B. Farrer, U.S. Magistrate Judge

*Printed name and title*

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Special Agent Matthew Gulezian, being duly sworn, do hereby depose and state:

1. I am currently employed as a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (“ATF”) and have been so employed since July 2020. I have participated in investigations concerning violations of Titles 18 and 26 of the United States Code, including those related to illegal possession of firearms and violations of the National Firearms Act (“NFA”).
2. On October 7, 2024, Suzanne Simpson was reported as a missing person to the Olmos Park Police Department. Officers went to the residence shared by Suzanne Simpson and her husband, Brad Chandler SIMPSON, on Olmos Drive in Olmos Park (“Simpson Residence”) to investigate, where they met SIMPSON. The Simpson Residence is within the Western District of Texas. As the investigation continued, officers developed probable cause to obtain a search warrant for the Simpson Residence. Law enforcement officers from the Olmos Park Police Department and Texas Department of Public Safety executed the warrant on October 9, 2024.
3. After the execution of the warrant, on October 10, 2024, a family member informed law enforcement officers that SIMPSON owned multiple firearms that he/she wanted to surrender. The family member recovered several firearms from a locked room in the Simpson Residence and showed them to police and ATF agents. This room also contained several silencers registered to SIMPSON in the National Firearms Registration and Transfer Record (“NFRTR”). The family member transported the firearms to the Olmos Park Police Department and surrendered them to law enforcement officers.
4. One of the firearms surrendered from the locked room in the Simpson Residence that contained silencers registered to SIMPSON was a Grand Power Stribog SP9 A3, 9x19 mm caliber rifle, serial number GSB4435, manufactured in Slovakia. This rifle has a barrel length of approximately 8 inches, along with a shoulder stock and vertical foregrip (depicted below). A rifle designed to be fired from the shoulder, fitted with a shoulder stock, and featuring a barrel less than 16 inches in length, is classified as a Short-Barreled Rifle (“SBR”) under the NFA. Title 26, United States Code §5861(d) provides that it is unlawful for any person to possess an SBR unless registered to him in the NFRTR.



5. A query of the NFRTR system indicated that this SBR was not registered to SIMPSON or any other person.

6. Based on the above facts, and my training and experience, I believe that there is probable cause that Brad Chandler SIMPSON possessed an SBR that was not registered to him, in violation of Title 26, United States Code §5861(d).

MATTHEW GULEZIAN

Digitally signed by MATTHEW  
GULEZIAN  
Date: 2024.10.11 09:06:14 -05'00'

Special Agent Matthew Gulezian  
Bureau of Alcohol, Tobacco, Firearms, and Explosives

SUBSCRIBED AND SWORN TO TELEPHONICALLY ON October 11, 2024.

  
HONORABLE RICHARD B. FARRER  
UNITED STATES MAGISTRATE JUDGE